DRAFT

ENVIRONMENTAL ASSESSEMNT FOR

TOLEDO FIRE STATION #6
1155 AND 1163 Oak Street
Toledo, Lucas County, Ohio

April 28, 2010

PREPARED BY:

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TABLE OF CONTENTS

LIST OF APPENDICES

LIST OF ACRONYMS

ADA	Americans with Disabilities Act of 1990
BLS	Basic Life Support
BMP	Best Management Practice
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CWA	Clean Water Act
EA	Environmental Assessment
EIS	Environmental Impact Statement
EMS	Emergency Medical Services
EO	Executive Order
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FNSI	Finding of No Significant Impact
HABS/HAER	Historic American buildings Survey/Historic American Engineering Record
lb	pound
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act of 1969
NESHAP	National Emission Standards of Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NFPA	National Fire Protection Association
NO_X	Nitrogen Oxides
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
OEPA	Ohio Environmental Protection Agency
O_3	Ozone
Pb	Lead
PCB	Polychlorinated biphenyls
PM	Particulate matter
PM_{10}	Particulate matter less than or equal to 10 micrometers in aerodynamic size
$PM_{2.5}$	Particulate matter less than or equal to 2.5 micrometers in aerodynamic size
ppm	parts per million
ROD	Record of Decision
RONA	Record of Non-applicability
SIP	State Implementation Plan
SHPO	State Historic Preservation Office
SO_2	Sulfur dioxide
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
VOC	Volatile Organic Compound

SECTION 1: BACKGROUND

1.1 Project Authority

The City of Toledo, Ohio has applied for and been selected to receive a fiscal year (FY) 2009 American Recovery and Reinvestment Act (ARRA) Fire Station Construction Grant (SCG) for the construction of a new Fire Station #6. The purpose of the FY 2009 ARRA SCG program is to jumpstart the U.S. economy, create or save millions of jobs, and put a downpayment on addressing long-neglected challenges nationally. Specifically the purpose of this grant program is to focus on these goals and the goals of the Assistance to Firefighters Grant (AFG) program (i.e., assisting fire departments in improving their basic response capacity and capability and improving firefighter safety). Public Law 111-5 (The ARRA of 2009) provides funding for this program.

In accordance with the National Environmental Policy Act (NEPA) of 1969, the President's Council on Environmental Quality (CEQ) regulations NEPA [40 Code of Federal Regulations (CFR) Parts 1500-1508], and FEMA regulations for NEPA compliance (44 CFR Part 10); FEMA must fully understand and consider the environmental consequences of actions proposed for federal funding. The purpose of the Environmental Assessment (EA) is to meet FEMA's responsibility under NEPA and to determine whether to prepare a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI) for the proposed project.

1.2 Project Location

The City of Toledo is located in the northwest corner of Ohio on the western edge of Lake Erie. Toledo is approximately 50 miles south of Detroit, Michigan and 100 miles west of Cleveland, Ohio. Toledo is the fourth largest city in Ohio and has a population of 313,619. According to the 2000 U.S. Census the Toledo Metropolitan Statistical Area has a population of 650,955. The Port of Toledo is one of the largest coal capacity and iron ore ports in the world. Toledo is also the nation's third busiest rail hub and the 15th-busiest air cargo hub. The City of Toledo is a community in good standing under the National Flood Insurance Program and is an Urban Area Security Initiative (UASI) city (refer to Figures in Appendix A).

The proposed fire station, which would replace the existing Fire Station #6, would service the East Toledo fire district, provide a response time that meets National Fire Protection Association (NFPA) 1710 response standards, enhance the Toledo Department of Fire and Rescue's (TFRD's) mutual aid response capability, expand services, and protect critical infrastructure.

Alternative 1 No Action, would continue to utilize the existing facility. Alternative 2, Remodel Existing Facility, would also utilize the existing facility, located at 642 Starr Avenue in the City of Toledo. Alternative 3, New Fire Station at 1155 Oak Street, is the proposed action. The proposed project site is located at the northeast quadrant of the intersection of Oak Street and Fassett Street in the City of Toledo. Maps of the City of Toledo and Project Location Maps showing locations of the existing fire station and the proposed location are provided in Appendix A. Photographs of the proposed site and surrounding area are provided as Appendix B. Geographic coordinates of the proposed project site are 41° 37' 45.06" N and 83° 31' 28.88" W. The proposed project site is bordered by Fassett Street to the west, Oak Street to the south, residential properties to the north, and vacant land to the east. No wetlands, floodplains, or waterways are located on or adjacent to the project site. The nearest identified watercourse, the Maumee River, is located approximately 0.25 mile away.

1.3 Purpose and Need

The TFRD needs a new #6 fire station to reduce response times in its "first due response area", improve mutual aid response times to neighboring communities, provide expanded services, and protect critical infrastructure. The proposed project provides for, or corrects, the following needs and deficiencies recognized at the exiting facility:

1. The existing facility is not in compliance with NFPA 1500 Standards-no carbon monoxide detection system or sprinkler systems are installed.
2. The facility is not compliant with the American with Disabilities Act (ADA) standards.
3. Despite numerous and on-going repairs, the roof leaks.
4. The sewer line that runs underneath the facility needs to be replaced which would require breaking up the apparatus floor and relocating apparatus to other stations, gravely impacting response capability to the area.
5. Site selection was based on the ability to provide a response time that meets NFPA 1710 response standards. The location of the station allows for a five (5) minute or less travel time to only 80 per cent of the station's first due response area.
6. The facility has insufficient training space.
7. The facility has insufficient space for exercise equipment. Currently the equipment is located in the dorm which does not allow adequate space for sleeping facilities.
8. There are no separate sleeping facilities for male and female firefighters.
9. The day room is located on the apparatus floor.
10. The facilities are inadequate for the number of assigned personnel.
11. The facility is not energy efficient.

The replacement of Station #6 was first included in the TFRD's 1986-1990 capital improvement program to reduce response times to the section of East Toledo that was formerly covered by Fire Station #10 which was closed in 1980. The Toledo Fire Department responded to 29,011 runs in 1980 compared to more than 50,000 runs in 2008. An example of the need to relocate Station #6 occurred in July 1985. A house fire located just four blocks from the closed #10 Station and at the far edge of #6 Station's district claimed the lives of three children. The location of the proposed new #6 Fire Station is just one block from the location of the former #10 Fire Station.

1.4 Existing Facility

The existing #6 Fire Station is located at 642 Starr Avenue in the City of Toledo (refer to the figures provided in Appendix A). It services the east side of Toledo along with Fire Station #13. The number of East Toledo residents was estimated at 30,210 in 2007. Fire Stations #6 and #13 are the only stations located on the east side of Toledo, which is separated from the rest of the city by the Maumee River and four bridges, two of which are draw bridges that open numerous times for lake freighters and pleasure craft. The existing facility is located on one approximately 0.284 acre parcel, has a gross building area of 5,758 square feet (SF), has three bays with no drive-thru capacity, and was constructed in 1951. The facility is located in a primarily residential neighborhood, the property is too small to allow for expansion, and there is no additional property available for expansion.

SECTION 2: ALTERNATIVES ANALYSIS

As a component of this environmental assessment, the applicant is required to provide alternatives to the proposed project. For the purposes of this evaluation, the following three alternatives have been considered: 1) no action, 2) remodeling of the existing facility, and 3) construction of a new fire station.

2.1 Alternative 1 – No Action Alternative

Under the No Action Alternative, the TFRD would continue to operate from the existing 60-year-old facility. There would be no environmental impacts associated with the No Action Alternative, but the current deficiencies would not be addressed. The existing facility is outdated, does not meet NFPA 1500 standards, and the location of the station allows for a five (5) minute or less travel time to only 80 percent of the station's first due response area.

2.2 Alternative 2 – Remodel Existing Facility

Under this alternative, the feasibility of renovating the existing station to comply with current standards and properly house the required equipment and personnel was explored. The existing Fire Station #6 was constructed in 1951 and is located at 642 Starr Avenue on the East Side of the City of Toledo. The current fire station is bordered by Starr Avenue to the north, Euclid Avenue to the east, residential property to the south and commercial property to the west. The existing facility has three bays that must be stacked from the street side and there is no drive-through capacity. While there would be minimal environmental impacts associated with the Remodel Existing Facility Alternative, many of the deficiencies identified could not be addressed by the alternative. In considering this option, it was recognized that it would not resolve the response issue due to the physical location of the existing facility.

The existing facility is located on 0.284 acre and is approximately 5,758 SF. The space requirement is approximately three times the current space. Due to the lot size restrictions, the only options to add square footage to the current structure would be to remain in the existing footprint and convert the building to a multi-story story structure or purchase additional land adjoining the site. In order to expand the facility horizontally, the City would have to acquire additional land by purchasing adjoining lots.

When the required renovations were calculated, the cost exceeded the comparative cost for total square footage as compared to a new structure. Since the City already owns the land proposed for the new construction of the station, the purchase of additional land would be at an increased cost to the City.

The current building would need to be brought into compliance with NFPA 1500 and ADA standards, carbon monoxide detection/sprinkler systems installed, and the sewer line that runs underneath the station would need to be replaced. In addition, the station is not energy efficient and the facilities are inadequate for the number of assigned personnel.

2.3 Alternative 3 – New Fire Station #6 (Proposed Alternative)

The new Fire Station #6 at the 1155 Oak Street location will provide a response time that meets NFPA 1710 response standards to the East Toledo fire district and also provide faster mutual aid response to the southerly surrounding communities of Northwood, Rossford, Perrysburg and Perrysburg Township, Ohio.

The 1155 Oak Street site is an approximately 0.99-acre parcel located on the east side of Toledo. The parcel is zoned industrial and is located in a mixed residential commercial area. The proposed project site is bordered by Fassett Street to the west, Oak Street to the south, residential properties to the north, and vacant land to the east.

The City of Toledo purchased the land at the corner of Fassett Street and Oak Street in 2002. Site selection was based on the ability to provide a response time that meets NFPA 1710 response standards, enhance the TFRD's mutual aid response capability, expand services, and protect critical infrastructure. The TFRD used Fire Department Mapping and Environmental (FLAME) software in 2001 to determine the best location for the new station and Geographic Information Systems (GIS) software in July 2009 to verify the original findings.

The TFRD has obtained funding to build a new five (5) bay fire station with drive through capability, approximately 8,000 square feet of living space, and 8,000 square feet of apparatus space. The new station will be built to the most recently approved requirements, codes, and International Code Council and NFPA fire station construction standards. The new station will include twelve (12) separate sleeping quarters, separate male and female locker rooms, two (2) officer's quarters, a kitchen/dining area, exercise room, day room, public restroom, watch area, and training room not to exceed 600 square feet.

The proposed project consists of a single-story fire station, approximately 16,082 SF in size. The northern portion of the site building will consist of the living quarters and the southern portion of the building will consist of 5 drive-thru apparatus bays. A paved parking lot will be located east of the living quarters and concrete will be located to the east and west of the apparatus bays. Sidewalks will be located on the western (along Oak Street) and southern (along Fassett Street) site boundaries. New curb and gutter and storm sewer will be constructed to drain runoff from the parking lot. Stormwater will be managed in accordance with City of Toledo requirements. The proposed design will provide adequate surge parking and flexible spaces that serve the needs of the fire station personnel, making the best use of federal and local funds. If a new facility on a new site is built, the existing station on Starr Avenue may be sold. The preliminary plan set for this alternative is provided as Appendix C.

The TFRD maintains the Region One Collapse Search and Rescue Unit and a Regional Mass Decontamination Trailer. These units provide a regional response for the 18 counties of Northwest Ohio, and Monroe County, Michigan and will be housed at the new station located 1.2 miles from Interstate 75 providing rapid access to the region via I-75, I-80/I-90 (Ohio Turnpike), I-280, and State Route 2. These units are presently housed at sites that are not manned 24 hours a day. The ability to move these units to the new station will ensure a more timely response and represent expanded services handled out of the new station. The need for a Basic Life Support (BLS) transport unit in this section of Toledo has been identified and a BLS transport unit will be housed at the new station. In addition, Battalion Chief #1 would be moved from station #13 to the new station improving response times within the fire district that includes five (5) stations covering one-third of the city.

The location of the new station will also provide Engine 6 Company a faster response time to the Michael DiSalle Bridge a critical infrastructure that carries I-75 across the Maumee River. The I-75 corridor is a major hazardous materials route and has been the site of numerous vehicle accidents especially during the winter months when the bridge is prone to ice conditions.

The new station will include a renewable energy budget of $90,000 to purchase approximately 50 solar panels that will supply energy to light the living quarters and power some station appliances and a $54,000 Energy Conservation Systems (LEED) budget. In addition, the new station will provide a cleaner and safer work environment for the firefighters. The City of Toledo is contributing a 20% cost share for this project.

The lack of project funding for a new #6 fire station will result in inadequate response times for 20 per cent of the station's first response area. The Region One Collapse Search and Rescue and Mass Decontamination Trailers will remain at locations that are not manned 24 hours a day creating a delayed response. In addition, lack of project funding will eliminate

approximately 50 construction jobs, lost sales to local building suppliers including Toledo's solar panel manufacturer, and lost tax revenues for the City of Toledo.

The proposed project will be designed in accordance with the NFPA, ADA, State of Ohio Commercial Building Code, local ordinances, and federal regulations. The building will be equipped with a fire alarm and fire suppression (sprinkler) system.

SECTION 3: AFFECTED ENVIRONMENT AND IMPACTS

3.1 PHYSICAL ENVIRONMENT

This section describes baseline environmental, cultural, and socioeconomic conditions at the Preferred Action Alternative site and its general vicinity, with emphasis on those resources potentially impacted by the Proposed Action.

3.1.1 Geology, Seismicity, and Soils

The project area is located in Lucas County, Ohio, and lies within an area of the Central Lowlands Physiographic Province. The county is situated predominantly on a lake plain formed largely as a result of postglacial events that followed the most recent (Wisconsinan) glacial epoch. The Lake Plains region is typified by nearly level topography that slopes gently southeastward toward the Maumee River and northeastward toward Lake Erie. The eastern portion of the county, in the vicinity of the project area, exhibits deposits of lacustrine clays and silty clays, which reflect past lake levels. The bedrock in Lucas County is found at depths ranging from 20 to 160 feet below surface grade, and is composed of limestone of the Silurian and Devonian age Monroe Formation (Ohio Geological Survey 2010).

According to the Toledo OH-MI U.S. Geological Survey 7.5-minute topographic map for the project area, the elevation of the proposed project site is approximately 910 feet above mean sea level (msl). Surface topography is relatively flat with a slight slope down to the south-southwest. The property is located in seismic Zone 1, defined as an area of low probability of damaging ground motion.

The U.S. Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS) online Web Soil Survey, indicates the proposed project site contains soils consisting of Dixboro-Urban land complex, 0-2 percent slopes. The Dixboro-Urban land complex consists of nearly level, somewhat poorly drained Dixboro soil and areas of Urban land. The USDA NRCS classifies the Dixboro-Urban land complex as a soil unit that may contain small inclusions of hydric components.

A Phase II ESA was conducted in March 2010. Four borings were advanced at the site to maximum depths of 16 to 20 feet blow ground surface. The site stratigraphy encountered during the soil boring advancement consisted of approximately 1.5 feet of fill sand overlying clay to the termination depth of the borings. No groundwater was encountered during the soil boring advancement.

The Farmland Protection Policy Act (FPPA) states that Federal agencies must "minimize the extent to which Federal programs contribute to the unnecessary conversion of farmland to nonagricultural uses…" The Dixboro-Urban land complex is not included on the Prime Farmland List of Ohio (revised 5/15/2009) and the site has not been used as farmland for at least 80 years. The preferred alternative does not fall within the FPPA definition of farmland. Therefore, no FPPA-related impacts are anticipated for this project.

Alternative 1: No Action –Under the No Action Alternative, no impacts to geology or soils would occur.

Alternative 2: Remodel Existing Facility –Under this alternative, construction activities would not be deep enough to impact underlying geologic resources. Short-term impacts to soils would occur during the construction period. Appropriate best management practices (BMPs) such as inlet protection, silt fence, prompt planting of vegetation, and completion of landscaping would be used to minimize runoff.

Alternative 3: New Fire Station #6 (Proposed Action) –Under the Proposed Action Alternative, construction activities would not be deep enough to impact underlying geologic resources. Short-term impacts to soils would occur during the construction period and 4,400 SY of the site would be disturbed. Appropriate BMPs such as inlet protection, silt fence, prompt planting of vegetation, and completion of landscaping would be used to minimize runoff. Any stockpiles of topsoil or clean fill material will be surrounded by silt fence and covered as necessary to prevent fugitive dust and soil erosion. Soil will be reused on site as needed and excess soil will be transported off-site for use on other construction projects within the City.

3.1.2 Water Sources and Water Quality (Surface Water)

The Clean Water Act (CWA), as amended in 1977, established the basic framework for regulating discharges of pollutants into waters of the United States. The 0.99-acre project site currently is vacant and grass-covered with several trees, with the exception of gravel parking areas at the northeastern and southeastern corners of the property. The topography of the project site is relatively flat with a slight slope down to the south-southwest. The nearest identified watercourse, the Maumee River, is located approximately 0.25 mile to the east of the proposed project.

The bedrock carbonate rocks serve as the uppermost regional aquifer. The site lies within an area in which bedrock wells developed within the limestone aquifer yield 100 to 300 gallons per minute (gpm). The wells producing this yield are typically completed at depths ranging from 500 to 580 feet below ground surface (bgs). The City of Toledo provides drinking water to the project area from the municipal distribution system, which is supplied from an inlet in Lake Erie.

Lucas County lies within the Lake Erie Drainage Basin. Regionally, groundwater flows toward the Maumee River and toward Lake Erie, but local variations in groundwater flow are common. Storm water discharges on the project would be discharged into the municipal combined sanitary and storm water sewer system.

The proposed project consists of an approximately 16,000 SF fire station with a parking lot and sidewalks around the building. The proposed parking facilities shall be constructed of standard and heavy duty asphalt with concrete walks providing ADA complaint connections to the proposed building. Water main and sanitary leads will be connected to existing utility lines located in the Oak Street right-of-way. The construction of the proposed Fire Station #6 will increase the volume of runoff produced by the site. All storm water runoff will be collected via traditional catch basins and pipes within the paved areas of the site and will be connected to the existing storm water utilities located in the Oak Street right-of-way.

Alternative 1: No Action – Under the No Action Alternative, no adverse impacts to surface water would occur.

Alternative 2: Remodel Existing Facility – Under this Alternative, there would likely be little to no direct permanent impacts to surface waters because the impervious area would likely remain the same. However, temporary short-term impacts to the municipal storm water system could occur during the construction period because of altered site runoff and additional soil erosion. To reduce impacts to surface water, the applicant would implement appropriate BMPs, such as installing straw bales and silt fences and prompt replanting of bare soils.

Alternative 3: New Fire Station #6 (Proposed Action) – Under the Proposed Action Alternative, there would be no direct permanent impacts to surface waters. Construction activities would increase the amount of impervious land on the site and would therefore increase runoff. All storm water runoff will be collected via traditional catch basins and pipes within the paved areas of the site and will be connected to the existing storm water utilities located in the Oak Street right-of-way. The fire station landscaping plan will be designed in an effort to meet all appropriate City Code requirements (Chapter 1108 – Landscape and Screening) to reduce heat island effect of impervious surfaces, helping to control runoff. Additionally, temporary short-term impacts to downstream surface waters could occur during the construction period because of soil erosion. To reduce impacts to surface water, and consistent with the City Code Chapter 941, Storm Water Discharge Control, a storm water pollution control plan will be developed for the site, the applicant would implement appropriate

BMPs, such as installing straw bales and silt fences and prompt replanting of bare soils. A National Pollution Discharge Elimination System (NPDES) permit will be required for the site during construction activities (OEPA).

3.1.3 Floodplain Management (Executive Order 11988)

Executive Order (EO) 11988 (Floodplain Management) requires Federal agencies to avoid direct or indirect support of development within the 100-year floodplain whenever there is a practicable alternative. Specifically, EO 11988 prohibits federal agencies from funding construction in the 100-year floodplain unless there are no practicable alternatives. FEMA's regulations for complying with EO 11988 are promulgated in 44 CFR Part 9.

FEMA uses Flood Insurance Rate Maps (FIRMs) to identify the regulatory 100-year floodplain for the National Flood Insurance Program (NFIP). Consistent with EO 11988, the FIRM for the proposed project area was examined during the preparation of this EA. Based on an examination of FIRM panel # 39095C0095D dated October 6, 2000, this project is not within the 100-year floodplain or 500-year floodplain (refer to the floodplain map provided in Appendix A).

Alternative 1: No Action – Under the No Action Alternative, no impacts to the floodplain would occur.

Alternative 2: Remodel Existing Facility – The existing Station #6 does not lie within a 100-year floodplain, therefore there are no impacts to the floodplain.

Alternative 3: New Fire Station #6 (Proposed Action) – The proposed site does not lie within a 100 year or 500-year floodplain, therefore there are no impacts to the floodplain.

3.1.4 Air Quality

The Clean Air Act (CAA) requires that states adopt ambient air quality standards. The standards have been established to protect the public from potentially harmful amounts of pollutants. Under the CAA, the U.S. Environmental Protection Agency (EPA) establishes primary and secondary air quality standards. Primary air quality standards protect the public health, including the health of "sensitive populations, such as people with asthma, children, and older adults." Secondary air quality standards protect public welfare by promoting ecosystems health, and preventing decreased visibility and damage to crops and buildings. The EPA has set national ambient air quality standards (NAAQS) for the following six criteria pollutants: ozone (O3), particulate matter (PM2.5, PM10), nitrogen dioxide (NO2), carbon monoxide (CO), sulfur dioxide (SO2), and lead (Pb). According to the EPA, Lucas County is in attainment for all six criteria pollutants, meaning that criteria air pollutants do not exceed the NAAQS (EPA, 2004).

Alternative 1: No Action – Under the No Action Alternative, there would be no impacts to air quality because no construction would occur.

Alternative 2: Remodel Existing Facility – Under this Alternative, short-term impacts to air quality would occur during remodeling/construction activities at the existing facility. To reduce impacts, the construction contractors would be required to wet down construction areas as needed to mitigate fugitive dust. Emissions from fuel-burning engines (e.g., heavy equipment and earthmoving machinery) could also temporarily increase the levels of some of the criteria pollutants, such as CO, NO2, O3, PM10, and non-criteria pollutants such as volatile organic compounds (VOCs). To mitigate these emissions, fuel-burning equipment run times would be kept to a minimum and equipment would be properly maintained.

Alternative 3: New Fire Station #6 (Proposed Action) – Under the Proposed Action Alternative, short-term impacts to air quality would occur during construction activities. To reduce impacts, the construction contractors would be required to wet down construction areas as needed to mitigate fugitive dust. Emissions from fuel-burning engines (e.g., heavy equipment and earthmoving machinery) could also temporarily increase the levels of some of the criteria pollutants, such as CO, NO2, O3, PM10, and non-criteria pollutants such as VOCs. To mitigate these emissions, fuel-burning equipment run times would be kept to a minimum and equipment would be properly maintained.

The new station is also using a photovoltaic energy system; a clean/renewable energy source. The new station will also have on site exhaust ventilation equipment to be utilized with the vehicles during repairs when the engines are running.

3.2 BIOLOGICAL ENVIRONMENT

3.2.1 Terrestrial and Aquatic Environment

The proposed project site is a vacant grassy field with gravel areas on the east side of the City of Toledo. According to historical information obtained during a Phase I ESA conducted for the City of Toledo, the project site was residential in 1881, occupied by a hotel from at least 1895 until at least 1913. The project site was redeveloped in 1944 as a YMCA which occupied the site until 1960. The project site has been vacant since at least 1976. Properties surrounding the site have historically been residential and commercial. The proposed project site is located in an urbanized area and supports wildlife common to inter-urban areas, including song birds and small mammals. Because the site and surrounding area has been developed, the area would be considered to have limited value for plant and wildlife species.

Coordination with the ODNR was initiated in a letter from TTL Associates, Inc. to ODNR dated February 9, 2010 requesting ODNR review of the proposed action. The ODNR response dated February 16, 2010 provided concurrence with the preliminary finding of no wetlands, waterways, or endangered resource impacts at the project site (refer to agency correspondence in Appendix D).

Alternative 1: No Action – Under the No Action Alternative, there would be no impacts to the terrestrial or aquatic environments.

Alternative 2: Remodel Existing Facility – Under this Alternative, impact to the terrestrial environment would not be a concern. The existing fire station and properties surrounding it are fully developed and consist of commercial and residential properties. The most likely potential negative impact would be a result of a decrease in the quality of storm water runoff from the construction site.

Alternative 3: New Fire Station #6 (Proposed Action) – Under the Proposed Action Alternative, impacts to nearby aquatic environments would not be a concern. Impacts to the terrestrial environment would result from the development of the site. About 4,400 SY of the site's existing vegetation and topsoil would be disturbed. No endangered resources would be impacted.

Once construction is complete, areas on the site not occupied by impervious surfaces will be replaced with landscaped grasses and ornamental vegetation.

3.2.2 Wetlands (Executive order 11990)

The USACE regulates the discharge of dredged or filled material into waters of the U.S., including wetlands, pursuant to Section 404 of the CWA. Additionally, EO 11990 (Protection of Wetlands) requires Federal agencies to avoid, to the extent possible, adverse impacts on wetlands that may result from federally funded actions. Wetlands in Ohio are also protected by the Ohio Environmental Protection Agency (OEPA).

No wetlands or surface waters have been identified on-site or adjacent to it. The nearest surface water is the Maumee River located approximately 0.25 mile west of the site. The nearest mapped wetland area is located within the Maumee River approximately 0.50 mile northwest of the site (NWI Map, 1977).

Alternative 1: No Action – Under the No Action Alternative, no impacts to waters of the U.S., including wetlands, would occur.

Alternative 2: Remodel Existing Facility – Under Alternative 2, use of BMPs would minimize erosion at the site and mitigate potential impacts to water resources in the area. Appropriate BMPs would be required at the construction site, including, but not limited to, the installation of silt fences and the revegetation of bare soils to minimize erosion.

Alternative 3: New Fire Station #6 (Proposed Action) – Under the Proposed Action Alternative, no impacts to waters of the U.S., including wetlands, would occur because none are present on or near the proposed project site. Wetlands closest to the proposed project site (2,640 feet northwest) are outside of the area to be disturbed by grading or filling and would not be directly or indirectly impacted by construction. During construction, the use of BMPs would minimize erosion at the site and mitigate potential impacts to the nearest water resources. Appropriate BMPs would be required at the construction site, including, but not limited to, the installation of silt fences and the revegetation of bare soils to minimize erosion.

3.2.3 Threatened and Endangered Species

The proposed project site is currently a vacant grassy lot that had previously been commercially/intuitionally developed since the late 1800s. The proposed project site supports wildlife common to urban land, including song birds and small mammals. In accordance with Section 7 of the Endangered Species Act (ESA) of 1973, the project area was evaluated for the potential occurrences of federally listed threatened and endangered species. The ESA requires any federal agency that funds, authorizes or carries out an action to ensure that their action is not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of designated critical habitats (FEMA 1996).

Research was performed to identify any potential Threatened, Endangered, Proposed, or Candidate species at the proposed project site. The following resources were reviewed: the U.S. Fish and Wildlife Service (USFWS) listing of Threatened, Endangered, Proposed, or Candidate species for Lucas County and information obtained from ODNR. The USFWS lists the following federally endangered and threatened species for Lucas County (USFWS 2010):

Indiana Bat (Endangered), Piping Plover (Endangered), Eastern Massasauga (Candidate), Eastern Prairie Fringed Orchid (Threatened), Karner Blue Butterfly (Endangered) and Rayed Bean (Candidate).

On the USFWS Web site, the Section 7, Technical Assistance Step by Step Instructions were followed to determine if any species or critical habitats may be present within the action area. Evaluation found that the suitable habitat is not present in the action area. Therefore, it was determined that these species and critical habitat are not present and no further consultation is required. Refer to documentation provided in Appendix C.

In February 2010, the ODNR was sent a project review request with information identifying the proposed site and describing the proposed action. In a letter response dated February 16, 2010 the ODNR indicated that they have no significant environmental issues with the project and that there are no wetlands, waterways, or endangered resource impacts associated with the project (Appendix C).

Alternative 1: No Action – Under the No Action Alternative, no impacts to threatened and endangered species would occur.

Alternative 2: Remodel Existing Facility – Under this Alternative, no impacts to threatened and endangered species would occur.

Alternative 3: New Fire Station #6 (Proposed Action) – Under the Proposed Action Alternative, 4,400 SY of the project site would be disturbed for construction of the new fire station. No impacts to threatened and endangered species would occur.

3.3 HAZARDOUS MATERIALS

A Phase I Environmental Site Assessment of the project site was conducted in February 2002. A visual survey of the site was conducted to determine the presence of any hazardous materials. During the site survey, no apparent visual indications (e.g. vent pipes, fill pipes, etc.) of the presence of underground storage tanks (USTs) or aboveground storage tanks (ASTs) were noted within the project site. No apparent visual indications of the presence of containers with hazardous materials or petroleum products that might represent a recognized environmental condition (REC) were observed on the project site. The Phase I ESA indicated that demolition debris may be present on the site and the demolition debris could contain asbestos-containing materials (ACM) and/or lead paint.

A site reconnaissance was conducted in February 2010 by TTL Associates, Inc. (TTL) No visual indications of the presence of petroleum or hazardous materials was observed. A Phase II ESA was conducted by TTL in March 2010. Four soil borings were advanced in areas of the site that previously were occupied by buildings. No field observations of impacts (i.e. field screening, visual or olfactory) were observed during the soil boring advancement. Soil samples were collected and submitted for analysis of volatile organic compounds (VOCs) and polynuclear aromatic hydrocarbons (PNAs). No concentrations of VOCs or PNAs were detected above the laboratory method detection limits.

Alternative 1: No Action – Under the No Action Alternative, there would be no construction and there would be no impacts related to hazardous materials or waste.

Alternative 2: Remodel Existing Facility – Under this Alternative, no hazardous materials or waste-related impacts would be anticipated. Proposed construction activities would require only minimal excavation and should not expose hazardous materials or produce hazardous wastes. Any hazardous materials discovered, generated, or used during construction would be handled and disposed of in accordance with applicable local, State, and Federal regulations.

Alternative 3: New Fire Station #6 (Proposed Action) – Under the Proposed Action Alternative, no hazardous materials or waste-related impacts would be anticipated. Proposed construction activities would require excavation for utilities, site grading, and the building foundation, but no hazardous materials would be anticipated. Any hazardous materials discovered, generated, or used during construction would be handled and disposed of in accordance with applicable local, State, and Federal regulations.

3.4 SOCIOECONOMICS

3.4.1 Zoning and Land Use/Transportation

The proposed project site is located at the northeast corner of Oak Street and Fassett Street on the east side of Toledo. This area is zoned commercial development (previous designated C3 and currently designated CR). Zoning maps for the project site and surrounding area are provided in Appendix A. The proposed project site is vacant and the surrounding properties are mixed commercial/residential.

Traffic can travel north or south on Oak Street and east or west on Fassett Street.

Alternative 1: No Action – Under the No Action Alternative, there would be no changes to zoning or transportation.

Alternative 2: Remodel Existing Facility – Under Alternative 2, there would be temporary increases in the volume of construction-related traffic in the immediate vicinity of the existing fire station #6. Because the fire station site is small and space is limited and because the existing site is located on Starr Avenue, construction planning and staging of construction activities would be needed. Traffic disruptions on Starr Avenue and slower traffic flow would be likely during construction. To mitigate potential delays, construction vehicles and equipment would be stored on-site during construction to the extent possible. Because the facility is an active fire station, an off-site location would be needed for storage of most of the construction vehicles and equipment. Appropriate traffic control and signage would be utilized. Over the long term, there would be little to no vehicle traffic increase at the exiting fire station #6. The site is currently used as the fire station and is located on Starr Avenue. Because of the size, the site and numerous constraints on expansion at the site, any remodeling and expansion of the facility would be limited. No significant increase in the number of facility-related vehicles coming and going from the site would be expected.

The existing fire station is zoned Multi Dwelling Residential (formerly R4, currently RM36 designation) and is surrounded by primarily residential properties.

Alternative 3: New Fire Station #6 (Proposed Action) – Under the Proposed Action Alternative, there would be only minor temporary increases in the volume of construction-related traffic in the immediate vicinity of the proposed project site. This would potentially result in a slower traffic flow for the duration of the construction phase. To mitigate potential delays, construction vehicles and equipment would be stored on-site during construction.

There is ample room at the site for equipment and materials staging. Appropriate traffic control and signage would be utilized.

Over the long term, vehicle traffic would increase at the proposed project site, primarily when EMS personnel are training or responding to traffic accidents, fires, severe weather, or other emergency events. No significant adverse impacts to transportation, site access, or traffic levels are anticipated.

3.4.2 Visual Resources

The proposed project site is vacant grassy land in east Toledo. The proposed project site has been developed with various commercial/institutional facilities since the late 1800s. The landscape character of the site is generally flat land with few visual obstructions since no existing buildings or above ground structures are present on site. Standing in the middle of the site, an observer can generally see the neighboring properties which consist of commercial and residential properties. Refer to Appendix B for site photos illustrating the existing visual resources of the site.

Alternative 1: No Action – Under this alternative, there would be no impacts to the visual resources of the existing station because no construction would occur.

Alternative 2: Remodel Existing Station – Under this alternative and as previously discussed, construction activities would be limited to the existing fire station #6 location. Due to the small area of the existing Station #6, there would be minor impacts to the existing visual resources surrounding Station #6 due to an increased building height. These impacts could be softened by the installation of canopy trees to provide visual distraction from the larger building.

Alternative 3: New Fire Station #6 (Proposed Action) – Under this proposed alternative, the construction of the proposed Station #6 would become a new obstruction to the existing visual resources of the site and surrounding properties. The architects of the proposed development have designed a building that matches the residential character of the surrounding properties and developments.

3.4.3 Noise

Noise can be considered unwanted sound and sound is typically measured in decibels (dB). An average measure of sound is known as the day-night average sound level (Ldn), and is used by agencies for estimating sound impacts and establishing guidelines for compatible land uses. An EPA document, Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety (EPA, 1974) provides a basis for State and local governments' judgments in setting standards. The document identifies a 24-hour exposure level of 70 dB as the level of environmental noise that will prevent any measurable hearing loss over a lifetime. Also, levels of 55 dB outdoors and 45 dB indoors are identified as preventing activity interference and annoyance. These levels are considered those which will permit spoken conversation and other activities such as sleeping, working and recreation. The levels are not single event, or "peak" levels, but rather, they represent averages over long periods of time. An occasional higher noise levels would be consistent with a 24-hour average of 70 dB, as long as a sufficient amount of relative quiet is experienced.

The sound level of a typical sound outdoors falls off in level at 6 dB per doubling of distance. Assuming a typical siren is 115 dB at a distance of 10 feet, at 20 feet it will be 109 dB, at 40 feet it will be 103 dB, at 80 feet it will be 97 dB, at 160 feet it will be 91 dB, at 320 feet it will be 85 dB, at 640 feet it will be 79 dB, at 1,280 feet it will be 73 dB, and at 2,560 feet it will be 67 dB. The proposed project site at the corner of Oak and Fassett Streets is located in a primarily commercial area and the existing Station #6 is located within a primarily residential neighborhood.

Alternative 1: No Action – Under the No Action Alternative, no impacts related to noise would occur.

Alternative 2: Remodel Existing Facility – Under Alternative 2, only temporary short-term increases in noise levels would be anticipated during construction. To reduce noise levels during that period, construction activities would be restricted to normal business hours.

Equipment and machinery utilized at the site would meet all local, State, and Federal noise regulations.

Over the long term, no significant change to noise levels would be anticipated. The existing Fire Station #6 has been located on its current site since 1951. Because of the size the site and numerous constraints on expansion at the site, any remodeling and expansion of the facility would be limited. Therefore, no significant change to noise levels would be anticipated.

Alternative 3: New Fire Station #6 (Proposed Action) – Under the Proposed Action Alternative, temporary short-term increases in noise levels would be anticipated during construction. To reduce noise levels during that period, construction activities would be restricted to normal business hours. Equipment and machinery utilized at the site would meet all local, State, and Federal noise regulations.

Over the long term, vehicle traffic would increase at the proposed project site, primarily when EMS personnel are training or responding to traffic accidents, fires, severe weather, or other emergency events. The increased traffic and sirens would increase the noise level, but these increases would be very short in duration and would occur very infrequently. It is anticipated that these noise peaks would not cause an exceedance of the EPA's 24-hour exposure levels; therefore, the proposed project does not include the use of noise barriers.

3.4.4 Public Services and Utilities

Public services to both the proposed Oak Street site and the existing Starr Avenue site are provided by the City of Toledo. These include police, fire, sewer, and water. Electric is provided by First Energy and natural gas service is provided by Columbia Gas.

Alternative 1: No Action – Under the No Action Alternative, there would be no changes to public services or utilities, but no improvements would be made to the existing Fire Station #6. In the short term, fire and other EMS would continue to be provided adequately. In the long term, without a new or improved facility there would be a negative impact on the East Toledo Fire District. The space needs and other identified needs would not be met.

Alternative 2: Remodel Existing Facility – Under Alternative 2, there would be no changes to most public services and utilities, but improvements would be made to the existing Fire Station #6. In the short term, fire and EMS would continue to be provided adequately and some improvements would be realized. In the long term, without a new facility and adequate space and facilities, there would be a negative impact on the East Toledo Fire District. The space needs and many of the other identified needs would not be met.

Alternative 3: New Fire Station #6 (Proposed Action) – Under the Proposed Action Alternative, there would be no changes to most public services and utilities, but significant improvements would be made to fire and other EMS facilities. In the short-term and long-term, benefits to the area communities would be realized as the identified space needs and other needs are met by the new Fire Station #6.

Additionally, the new station will include an energy budget of $90,000 to purchase solar panels that will supply energy to light the living quarters and power some station appliances. The building is also being built to Leadership in Energy and Environmental Design (LEED) sustainable building standards. The sustainability energy efficient design, and renewable energy source area all enhancements to energy savings.

The site location will provide a response time that meets NFPA 1710 response standards. The site building will provide compliance with NFPA 1500 standards, the ADA standards, and will be energy efficient. The site building will provide adequate space for the number of assigned personnel including; sufficient training space, sufficient space for exercise equipment, and separate sleeping facilities for male and female firefighters.

3.4.5 Traffic and Circulation

The existing public roads adjacent or near the project site include Oak Street (to the west) Fassett Street (to the south), and a gravel alley to the east. All roads (herein referred to as the local roads) are under the jurisdiction of the City of Toledo. All local roads (with the exception of the alley) are 2 lane asphalt roads. All construction traffic shall enter and exit the

site from Oak Street. Mud mats will be installed at this access point to limit tracking of mud and debris onto Oak Street. Public transportation within the immediate area is limited to community buses.

Alternative 1: No Action – Under this alternative, there would be no impacts to existing traffic and circulation because no construction would occur.

Alternative 2: Remodel Existing Station – Under this alternative and as previously discussed, construction activities would be limited to the footprint of the existing building on Starr Avenue; therefore, there would be limited impacts to traffic and circulation during the construction period. These would be mitigated by preventing parking of any construction equipment or vehicles on Starr Avenue during business hours.

Alternative 3: New Fire Station #6 (Proposed Action) – Under this proposed alternative, the construction of the proposed Fire Station #6 would create short term traffic and circulation impacts related to construction traffic coming to and from the site. No parking would be permitted on Oak Street. Long term impacts would be a very minor increase of trips generated by the site using Oak Street and the surrounding local roads.

3.4.6 Environmental Justice (Executive Order 12898)

EO 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) mandates that Federal agencies identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations. Socioeconomic and demographic data for the project area were analyzed to determine if a disproportionate number of minority or low-income persons have the potential to be adversely affected by the proposed project.

The U.S. Census Bureau data for Toledo, Ohio, states that 70.2% of the population is white, 23.5% African American, 0.3% American Indian or Alaska Native, 1.0% Asian, 5.5% some other race, and 2.6% two or more races (U.S. Census Bureau, 2000). The percentage of African Americans (23.5%) in Toledo is higher than the State of Ohio (11.5%). Approximately 7.3% of the homes in Toledo speak a language other than English, which is similar to the entire State of Ohio (6.1%).

Alternative 1: No Action – Under the No Action Alternative, there would be no disproportionately high and adverse effects on minority or low-income populations. All populations could potentially be adversely affected by the lack of improvements to Fire Station #6.

Alternative 2: Remodel Existing Facility – Under this alternative, there would be no disproportionately high and adverse impacts on minority or low-income populations. Improvements to the existing facility would benefit all populations.

Alternative 3: New Fire Station #6 (Proposed Action) – Under the Proposed Action Alternative, there would be no disproportionately high and adverse impacts on minority or low-income populations. The demographics of the proposed location of the new station are similar to those of the existing station. Implementation of the Proposed Action would benefit all populations within the East Toledo Fire District.

3.4.7 Safety and Security

Because children may suffer disproportionately from environmental health risks and safety risks, EO 13045, *Protection of Children From Environmental Health Risks and Safety Risks*, was introduced in 1997 to prioritize the identification and assessment of environmental health risks and safety risks that may affect children and to ensure that Federal agencies' policies, programs, activities, and standards address environmental risks and safety risks to children. This socioeconomics section identifies the distribution of children and locations where numbers of children may be proportionately high (e.g., schools, childcare center, family housing, etc.) in areas potentially affected by the Proposed Action.

To minimize risks to safety and human health, all construction activities would be performed using qualified personnel trained in the proper use of the appropriate equipment including all appropriate safety precautions. Additionally, all activities would be conducted in a safe manner in accordance with the standards specified in Occupational Safety and Health Act (OSHA) regulations.

Alternative 1: No Action – Under the No Action Alternative, there would be no construction and no direct impacts to safety of the population would occur. However, if an emergency event were to occur, area residents would continue to be served by the existing fire station that does not meet current NFPA response guidelines.

Alternative 2: Remodel Existing Facility – Under this alternative, improvements to the existing Station #6 would provide increased protection for area residents during emergency events.

A day care facility (Toddler's Educational Child Care at 631 Euclid) is located across the Starr Avenue and Euclid Avenue intersection from the existing Fire Station #6 and the station is located in a primarily residential neighborhood. However, the Fire Station has been at this location since 1951.

Construction activities would present safety risks to those performing the activities. Access to the site would be restricted to protect the public and to minimize risks to safety and human health. The appropriate signage and barriers would be in place prior to construction activities to alert pedestrians and motorists of project activities. There would be no disproportionate health and safety risks to children.

Alternative 3: New Fire Station #6 (Proposed Action) – Under the Proposed Action Alternative, construction of a new Station #6 would provide increased protection and faster response time for area residents during emergency events.

Construction activities would present safety risks to those performing the activities. Access to the site would be restricted to protect the public and to minimize risks to safety and human health. The appropriate signage and barriers would be in place prior to construction activities to alert pedestrians and motorists of project activities. There would be no disproportionate health and safety risks to children.

3.5 HISTORIC AND CULTURAL RESOURCES

In addition to review under NEPA, consideration of effects to historic properties is mandated under Section 106 of the National Historic Preservation Act (NHPA), as amended, and implemented by 36 CFR Part 800. Requirements include identification of significant historic properties that may be affected by the Proposed Action. Historic properties are defined as archaeological sites, standing structures, or other historic resources listed in or eligible for listing in the National Register of Historic Places (NRHP) (36 CFR 60.4).

As defined in 36 CFR Part 800.16(d), the Area of Potential Effect (APE), "is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if such properties exist."

In addition to identifying historic properties that may exist in the proposed project's APE, FEMA must also determine, in consultation with the appropriate State Historic Preservation Officer (SHPO)/Tribal Historic Preservation Officer (THPO), what effect, if any, the action will have on historic properties. Moreover, if the project would have an adverse effect on these properties, FEMA must consult with SHPO/THPO on ways to avoid, minimize, or mitigate the adverse effect

During construction, ground disturbing activities would be monitored. Should human skeletal remains or historic or archaeological materials be discovered during construction, all ground-disturbing activities on the project site would cease and the coroner's office (in the case of human remains), FEMA, and the Ohio Historic Preservation Office would be notified immediately.

Alternative 1: No Action – Under this alternative, there would be no construction on site and therefore no impacts to historic or cultural resources.

Alternative 2: Remodel Existing Station – Under this alternative, a remodel and expansion to the existing Starr Avenue Station #6 would occur within the existing footprint of the station and therefore would have no impacts to historic or cultural resources.

Alternative 3: New Fire Station #6 (Proposed Action) – Under this proposed alternative, the construction of a new Station #6 could have potential to impact historic or cultural resources.

Evaluation of the Proposed Action is described in Sections 3.5.1 and 3.5.2.

3.5.1 Historic Structures and Archaeological Resources

The southeast corner of Oak and Fassett Streets is occupied by the former Peoples Bank, which is included in the Ohio Historic Inventory as LUC 3-10.

On February 18, 2010, a letter and supporting documentation was submitted to the SHPO with a Request for SHPO Comment and Consultation on a Federal Undertaking. The request included documentation gathered by FEMA on historic properties in the area of the proposed project site. The State Historic Preservation Office responded to the request on March 26, 2010. The response indicated that it is the opinion of the State Historic Preservation Officer that no historic properties are affected within the APE of this undertaking. A copy of the FEMA request and associated SHPO consultation letter has been included in Appendix C.

3.5.2 Tribal Coordination and Religious Sites

On November 6, 2000, President Clinton signed Executive Order (EO) 13175, entitled, "Consultation and Coordination with Indian Tribal Governments". The EO directs federal agencies, "to establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications, to strengthen the United States government-to-government relationships with Indian tribes, and to reduce the imposition of unfunded mandates upon Indian tribes…"

Requests for evaluation of the presence or absence of known archaeological and Indian Religious sites within the proposed project areas were submitted on February 18, 2010 to recognized Tribes that may have an interest in projects located in Lucas County, Ohio. Those tribes include; Wyandotte Nation, Prairie Band of Potawatomi Nation, Kickapoo Tribe of Indians of the Kickapoo Reservation in Kansas, Kickapoo Traditional Tribe of Texas, Miami Tribe of Oklahoma, and Kickapoo Tribe of Oklahoma.

To date, a response from the tribes has not yet been received. Copies of the tribal consultation request letters are included in Appendix C.

3.6 COMPARISON OF ALTERNATIVES

The following table summarizes the impacts and mitigation of Alternatives 2 and 3. Because Alternative 1 is a no action alternative and thus there is no impact, it has not been included in this table.

Table 1: Impact and Mitigation Summary

Affected Environment	Impacts	Mitigation
Geology and Soils	Alt 2: No impact to geology, short term impact to soils during construction. Alt. 3: No impact to geology, short term impact to soils during construction. Construction would disturb about 4,400 SY of the site.	Applicable soil erosion BMPs; silt fence, quick establishment of vegetation

Table 1: Impact and Mitigation Summary (Cont.)		
Affected Environment	**Impacts**	**Mitigation**
Water Quality (including surface water and ground water)	Alt 2: Short-term impacts to surface water are possible during construction. No impact to water resources. Alt 3: Short-term impacts to surface water are possible during construction. No impact to water resources. Site has public water.	None
Floodplain	Alt 2: No impact. Existing site does not lie in the 100 or 500 year floodplain Alt 3: No impact. Proposed site does not lie in the 100 or 500 year floodplain	None
Air Quality	Alts 2 and 3: Short-term impacts from construction dust and equipment emissions during construction	Water down disturbed areas of the site. Keep fuel burning equipment use to a minimum.
Terrestrial and Aquatic Environments	Alt 2: No impact Alt 3: No impact	None
Waters of the U.S. (including wetlands)	Alt 2: No impact Alt 3: No impact	None
Threatened and Endangered Species	Alt 2: No impact Alt 3: No impact	None
Hazardous Materials	Alts 2 and 3: No impacts anticipated. No hazardous materials are anticipated at either location and no releases of contaminants to the environment have been reported.	None
Zoning, Land Use, and Transportation	Alt 2: No impact Alt 3: The proposed development is consistent with the CR zoning designation. Some construction traffic, with minor long-term increase to traffic.	All construction vehicles will be stored onsite with applicable construction signage.
Noise	Alt 2: Short-term impact during renovation Alt 3: Short-term impact during construction, long-term impact would include siren noise and increased road traffic	Construction would be limited to day light business hours. Siren noises would be infrequent and of very short durations when occurring and would not exceed EPA 24-hour exposure
Public Services and Utilities	Alt 2: No impact Alt 3: No impact	None

Table 1: Impact and Mitigation Summary (Cont.)		
Affected Environment	**Impacts**	**Mitigation**
Environmental Justice	Alts 2 & 3: No disproportionately high or adverse effect on minority or low-income populations is anticipated	None
Public Health and Safety	Alts 2 & 3: Both would have positive long-term impacts on the health & safety of the population	None
Historic and Cultural Resources	Alts 2 & 3: No impacts are anticipated	During construction, ground disturbing activities would be monitored. Should human or skeletal remains or historic or archaeological materials be discovered during construction, all ground-disturbing activities on the project site would cease and the coroner's office (in the case of human remains), FEMA and the Ohio Historic Preservation Office would be notified immediately

SECTION 4: CUMULATIVE IMPACTS

According to CEQ regulations, cumulative impacts represent the "impact on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can results from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7)." In accordance with NEPA and to the extent reasonable and practical, this EA considered the combined effect of the Proposed Action Alternative and other actions occurring or proposed in the vicinity of the proposed project site.

No proposed or current actions by others were identified in the vicinity of the proposed project site; therefore, no cumulative impacts are anticipated.

SECTION 5: PUBLIC PARTICIPATION

FEMA is the lead Federal agency for conducting NEPA compliance process for the proposed Toledo Fire Station #6 in Toledo, Lucas County, Ohio. It is the goal of the lead agency to expedite the preparation and review of NEPA documents and to be responsive to the needs of the community and the purpose and need of the proposed action while meeting the intent of NEPA and complying with all NEPA provisions.

Interagency reviews have been conducted in the form of agency consultation letters. Copies of the letters are provided in Appendix C.

The City of Toledo will notify the public of the availability of the draft EA through publication of a public notice in a local newspaper as required. FEMA will conduct a public comment period commencing on the initial date of publication of the public notice.

SECTION 6: MITIGATION MEASURES AND PERMITS

In accordance with applicable local, state and federal regulations, the applicant would be responsible for acquiring any necessary permits prior to commencing construction at the proposed project site. The following permits and approvals may be required prior to construction:

1) National Pollution Discharge Elimination System
2) Building Permit-City of Toledo
    - General Building
    - Electrical
    - Plumbing/HVAC
3) State of Ohio Building Permit
4) Storm Water Pollution Prevention Plan
5) City of Toledo Water and Sewer Tap Permits
6) City of Toledo Curb Cut Permit
7) City of Toledo Right of Way Work Permit

SECTION 7: CONSULTATONS AND REFERENCES

The following agencies and organizations were consulted or were contacted to request project review during the preparation of this EA. Responses received to date are included in Appendix C.

1. Ohio Department of Natural Resources
2. Ohio State Historic Preservation Office
3. City of Toledo-Environmental Services
4. City of Toledo Building Department
5. Toledo Fire Department
6. Various Native American Tribes
7. Ohio Geological Survey
8. Ohio Environmental Protection Agency

SECTION 8: LIST OF PREPARERS

Preparation and quality control review of the draft and final EA:

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APPENDIX A

Figures

APPENDIX B

Site Photographs

APPENDIX C

Agency Correspondence

APPENDIX D

Public Notice

APPENDIX E

Public Comments